

on the representatives of the grandfather's estate to restore that amount to the trusts of the grandfather's marriage settlement.

INTESTATES' ESTATES ACT, 1890 (53 & 54 VICT., c. 29) SS. 2, 4—WIDOWS' CHARGE  
—DOWER—(58 VICT., c. 21, ONT.).

In *Re Charriere, Duret v. Charriere*, (1896) 1 Ch. 912, it became necessary to determine the effect of the Intestates' Estates Act, 1890 (53 & 54 Vict., c. 29), from which the Ontario Act, 58 Vict., c. 21. is adapted. The question was whether the widow's dower was subject to a proportional part of the charge of £500 given by the Act in favor of the widow of an intestate, or whether she was entitled to the £500 and also to her dower without any abatement. North, J., held that the £500 must be proportionately charged on the dower.

IMPROVEMENTS—TENANT IN COMMON—MORTGAGE.

In *re Cook's Mortgage*, (1896) 1 Ch. 923, a tenant in common in fee of one-half, and a tenant in common for life of the other half of land, jointly laid out £700 in permanent improvements; the land was subsequently sold under a paramount mortgage and the tenant in common in fee died. The question arose as to how the surplus purchase money, after payment of the mortgage, was divisible. North, J., decided that the representatives of the deceased tenant in common were entitled to one-half of the value of the improvements at the time of sale, provided the same should not exceed £350. He says: "The share of the purchase money now distributable to be received by those now entitled to Rebecca Cook's moiety will be one-half, and also such further sum as represents one-half of the present value of the improvements, but so that such further sum is not in any case to be more than one moiety of £700."

COMPANY—WINDING UP—LIQUIDATOR—SUMMARY JURISDICTION—DAMAGES.

In *re Hill's Mining Co.*, (1896) 1 Ch. 947, a company being in voluntary liquidation, a scheme was sanctioned providing for the sale of the assets to a new company, and that the